

EXHIBIT 18

KIMBERLY COLE, ALAN COLE,
JAMES MONICA, LINDA BOYD,
MICHAEL MCMAHON, RAY
SMINKEY, JAMES MEDDERS,
JUDY MEDDERS, ROBERT
PEPERNO, SARAH PEPERNO, and
KELLY MCCOY, on behalf of
themselves and all others similarly
situated,

VS.

Defendant.

Civil Action No.: 13-cv-7871(FLW)(TJB)

**DECLARATION OF KIMBERLY
COLE**

1. I am over the age of 18 and a Plaintiff in this action. The facts contained in this declaration are based on my personal knowledge, and if called upon to do so, I could and would testify to the matters stated herein.


3. During the construction of my home, my father and I discussed the various items being used in the construction of my home and I also oversaw the

construction of my home.

4. Had NIBCO included a warning that its PEX Products were defective and would fail prematurely, my father would have discussed such a warning with me and I would not have selected NIBCO's PEX Products to be installed in my home.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on July 21, 2017.

DocuSigned by:

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Kimberly Cole